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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

RICHARD J. HELFMAN LIFE INSURANCE TRUST DTD 12/30/89; SUSAN HELFMAN, individually and in her capacity as Trustee of the Richard J. Helfman Life Insurance Trust dtd 12/30/89; and STEPHEN HELFMAN, individually and in his capacity as Trustee of the Richard J. Helfman Life Insurance Trust dtd 12/30/89,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04636 (SMB)

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 18, 2015.
- 2. Fact Discovery shall be completed by: July 10, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: September 29, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: October 30, 2017.
- 5. The Deadline for Completion of Expert Discovery shall be: November 28, 2017.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before December 5, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before December 19, 2017.
- 8. The Deadline for Conclusion of Mediation shall be: On or before April 18, 2018.

Dated: New York, New York October 8, 2015

BAKER & HOSTETLER LLP

By:_/s/ Nicholas J. Cremona
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